

REMARKS

Claims 1-26 are pending in the application and stand rejected 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 5,721,827 to Logan et al. in view of U.S. Patent No. 6,269,336 to Ladd et al and further in view of U.S. Patent No. 5,644,686 to Hekmatpour. It is submitted that at the very least, claim 1 is patentable distinct and non-obvious over the combination of Logan, Ladd, and Hekmatpour.

The Office Action fails to present any sound legal reasoning to support a *prima facie* case of obviousness against claim 1 based on Logan, Ladd, and Hekmatpour. Indeed, the obviousness rejections are seemingly based on nothing more than a strained parsing of the claim language in an effort to fit the claim language to irrelevant teachings of the cited references, with no due consideration given to the proper context of the claimed inventions as a whole. Undoubtedly, the cited combination of references does not disclose or suggest a *hierarchical structured document* that includes a *mapping of content pages* that can be accessed from a server or a *mapping of logic of dialog services* that can be accessed from the server, much less *wherein the hierarchical document is processed by a client to activate the content pages or the logic of the dialog services within the hierarchical structured document so as to allow a user to directly access any one of the content pages or dialog services*, as essentially claimed in claim 1.

Once again, the Examiner's reliance on Logan remains unclear. On page 2 of the Office Action, Logan appears to be cited simply as teaching *a server containing HTML web pages, and a client that accesses information through an ISP to download a document with desired information*. In response, Applicant respectfully contends that such reliance is irrelevant and squarely misses the point in view of the fact that claim 1 recites a *server comprising means for*

generating at least one hierarchical structured document, wherein the hierarchical structured document comprises a mapping of content pages that can be accessed from the server or a mapping of logic of dialog services that can be accessed from the server.

What is glaringly absent from the Office Action is any explanation as to how Logan (or any other cited reference) teaches or suggests *the hierarchical structured document comprises a mapping of content pages that can be accessed from the server or a mapping of logic of dialog services that can be accessed from the server*. The Examiner seems to simply ignore this claim feature when relying on Logan teaching of an “web server”.

The analysis continues with an acknowledgment that Logan does not explicitly teach “allowing the user to active content pages of use the logic to access dialog services”. The Examiner then contends that Ladd teaches the *allowance of a user to access the dialog service and content pages via a server*. At this point, essentially, the Examiner relies on Logan and Ladd as teaching *a server containing HTML web pages, and a client that accesses information through an ISP to download a document with desired information, wherein a user can access the dialog service and content pages via a server*. Again, this analysis is fundamentally flawed in that it fails to address the specific claim language.

The analysis then continues with an acknowledgment that Logan and Ladd does not specifically teach “the content (of content pages) to be in a hierarchical document structure.” In the context of the claimed invention, it appears that the Examiner essentially acknowledges that the combination of Logan and Ladd does not teach *a hierarchical structured document that comprises a mapping of content pages that can be accessed from the server or a mapping of logic of dialog services that can be accessed from the server*, as recited in claim 1. In fact, this

is what Applicants have been contending in this and previous Office Action responses. So it appears that the Examiner has at least conceded to this point of contention.

Now, the Examiner seems to cite Hekmatpour to cure the deficiencies of Logan and Ladd in this regard. In particular, the Examiner contends that Hekmatpour teaches “*the content to be in a structure document, with associated links, to be used by the user*” (citing Col. 24 lines 30-43; Col. 25 lines 15-25, Abstract Col. 1 lines 7-20). However, the cited sections of Hekmatpour disclose nothing more than the use of hierarchical node architectures for defining logical pages (or logical page templates) of a multimedia application. The Examiner should understand that the disclosure of “logical page templates” is not the same as a *hierarchical structured document that comprises a mapping of content pages that can be accessed from the server or a mapping of logic of dialog services that can be accessed from the server*, whereby the hierarchical document can be used by the client to activate the content pages or the logic of the dialog services within the at least one hierarchical document so as to allow the user to directly access any one of the content pages or dialog services

It seems that the Examiner fails to appreciate the inventive concepts of the claimed inventions, and in particular with respect to the functionality and purpose of the claimed *hierarchical structured document*. The Applicant would suggest that the Examiner review the exemplary descriptions given on pages 10-15 and 22-23 of the specification, for example, to gain an understanding of the subject matter of the claimed inventions. If the Examiner has any questions, Applicant respectfully requests the Examiner to contact the Applicant’s undersigned attorney.

For at least the above reasons, the combined teachings of Logan and Ladd and

Hekmatpour fails to render claim 1 obvious. Moreover, without further elaboration, claims 2-26 are patentable and non-obvious over the cited combination at least for the same reasons given for claim 1. Therefore, the claims rejections should be withdrawn.

Respectfully submitted,



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